

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

McDonnell Crowley, LLC
115 Maple Avenue
Red Bank, NJ 07701
(732) 383-7233
Brian T. Crowley
bcrowley@mchfirm.com

-and-

THE LAW OFFICES OF RICHARD J. CORBI PLLC
1501 Broadway, 12th Floor
New York, NY 10036
(646) 571-2033
Richard J. Corbi (*pro hac vice* forthcoming)
rcorbi@corbilaw.com

Counsel to Taussig Risk Capital Advisors, Inc.

In re:

BED BATH & BEYOND, INC., *et al.*,^a

Debtor.

Chapter 11

Case No. 23-13359 (VFP)

(Jointly Administered)

**APPLICATION FOR PRO HAC VICE ADMISSION
OF RICHARD J. CORBI**

TO: HONORABLE VINCENT F. PAPALIA,
UNITED STATES BANKRUPTCY JUDGE:

1. The applicant, Brian M Crowley, ("**Movant**"), a member in good standing of the Bar of the State of New Jersey, an attorney admitted to practice before the United States District Court for the District of New Jersey, and a partner with McDonnell Crowley LLC, hereby moves the

Court for an order permitting Richard J. Corbi, founder of The Law Offices of Richard J. Corbi PLLC (“RJC PLLC”), counsel to Taussig Risk Capital Advisors, Inc. (“TRCA”) in the above-captioned chapter 11 proceeding of Bed, Bath & Beyond, Inc., *et al.*, (the “Debtors”), to practice *pro hac vice* before the United States Bankruptcy Court for the District of New Jersey to represent the Debtors pursuant to District of New Jersey Local Civil Rule 101.1 and Local Bankruptcy Rule 2090-1 in the above captioned bankruptcy case (the “Bankruptcy Case”). In support of the relief requested herein, the Movant states as follows:

JURISDICTION

2. This Court has jurisdiction to consider this application pursuant to 28 U.S.C. §§157 and 1334. Consideration of this application is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
3. By this application, the Movant requests entry of an Order admitting *pro hac vice*, Richard J. Corbi, Esq., founder of The Law Offices of Richard J. Corbi PLLC (the “Applicant”). The good standing of the Applicant is set forth in the Applicant’s certification which is submitted herewith (the “Certification”).
4. Mr. Corbi is the founder of The Law Offices of Richard J. Corbi PLLC with an office at 1501 Broadway, 12th Floor, New York, New York 10036. As the Certification demonstrates, Mr. Corbi is a member in good standing of the Bar of the highest court in which he is admitted and in the various federal courts set forth in the Certification.

^a The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor’s tax identification number may be obtained on the website of the Debtor’s proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>.

5. It is anticipated that Mr. Corbi will be active in the representation of TRCA in this Bankruptcy Case. Accordingly, the Movant respectfully requests that the Court grant the *pro hac vice* admission of Mr. Corbi and that he be permitted to appear on behalf of the Trustee in connection with this Bankruptcy Case.

6. No previous application for the relief sought herein has been made to this or any other court in connection with this proceeding.

WAIVER OF MEMORANDUM OF LAW

7. Pursuant to Local Rule 9013-1, Movant respectfully requests that the Court waive the requirement that it file a memorandum of law in support of this Application. Movant respectfully submits that no memorandum of law is necessary because no novel issues of law are presented herein.

CONCLUSION

8. WHEREFORE, Movant respectfully requests the Court enter an Order, substantially in the form filed herewith, permitting Mr. Corbi to appear *pro hac vice* in association with the Movant as counsel to TRCA and granting such other and further relief as is just.

MCDONNELL CROWLEY LLC
Co-Counsel for Taussig Risk Capital Advisors, Inc.

By: /s/ Brian M. Crowley
BRIAN M. CROWLEY

Dated: April 11, 2024